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December 1, 1992

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Ms. Donna R. Searcy
Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: ET Docket No. 92-191; RM-7511
In the Matter of Amendment of Section 2.106 of the Commission's Rules
to Upgrade to Primary Status the Secondary Mobile-Satellite Service
Allocation at 19.7-20.2 GHz and 29.5-30.0 GHz

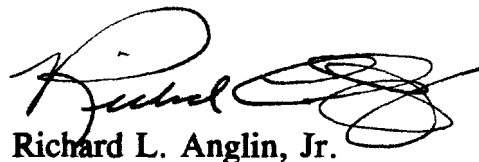
Dear Ms. Searcy:

Enclosed are the original and required copies of the Reply Comments of Calling
Communications Corporation in the above-captioned proceeding.

Please call me if you have any questions.

Very truly yours,

ANGLIN & GIACCHERINI


Richard L. Anglin, Jr.

RLA:cms
Enclosure

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List A B C D E

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 2.106 of the)	ET Docket No. 92-191
Commission's Rules to Upgrade to)	RM-7511
Primary Status the Secondary)	
Mobile-Satellite Service Allocation)	
at 19.7-20.2 GHz and 29.5-30.0 GHz)	

Reply Comments of Calling Communications Corporation

Calling Communications Corporation ("Calling"), by its attorneys, hereby replies to the comments filed on the Commission's Notice of Proposed Rule Making in the above-captioned docket, 7 FCC Rcd 5626 (1992) ("Notice"). Over the last two and one-half years Calling has developed technologies to be used to deliver a variety of telecommunications services in the above-referenced bands. Calling has a vested interest in the rules the Commission adopts for these bands because the value of Calling's investment in these new technologies will undoubtedly be affected if some of the proposals currently before the Commission are adopted.

Calling agrees with the Commission and TRW, Inc. that "technology, rather than restrictive service definitions, should dictate access to the 20/30 GHz bands to encourage the development of this unused spectrum." Notice, 7 FCC Rcd at 5628;

Comments of TRW, Inc. ("TRW Comments") at 5. Calling's technologies have broad commercial application in the provision of enhanced telecommunications services which today would be classified as both fixed-satellite service ("FSS") and mobile-satellite service ("MSS").¹ The Commission's proposed reallocation allows implementation of these new technologies to proceed apace, and for that reason, Calling supports the Commission's proposal. Furthermore, Calling agrees with Norris Satellite Communications, Inc. ("Norris") that flexibility in allocations is required to allow commercial telecommunications service providers to respond to the demands of the market.² Comments of Norris Satellite Communications, Inc. ("Norris Comments") at 4.

Calling likewise agrees with Norris that it is inappropriate and premature for the Commission to consider either a partition of the band or the adoption of technical standards as proposed by the National Aeronautical and Space Administration ("NASA"). Norris Comments at 6-7. Calling's technologies could significantly impact spectrum efficiency, economies of scale and the delivery of enhanced services. However, the acceptance of Calling's new technologies into the marketplace will depend upon demonstration of successful performance in a variety of applications. The Commission's existing rules are more than adequate to allow multiple service

¹ These very same technologies may also be used in the provision of broadcast-satellite services ("BSS").

² As a matter of general policy, Calling believes the Commission should adopt flexible allocations and allow technologies proven in the marketplace to shape the use of spectrum.


providers and multiple technologies to use these bands. Calling therefore urges the Commission to maintain the maximum flexibility in the use of the above-referenced bands. The Commission should neither partition the band nor adopt technical standards at this time.

Conclusion

Calling has invested in developing advanced technologies to enable the most economic and efficient utilization of the above-referenced bands. Calling believes it is in the public's interest that the Commission adopt only those rules necessary to protect and enhance early and continued use of the band. The Commission's proposal enhances early implementation of these technologies, and for that reason Calling supports it.

Respectfully submitted,

CALLING COMMUNICATIONS
CORPORATION

By: 
Richard L. Anglin, Jr., Esq.

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Dated: December 1, 1992

Its Attorneys.

AFFIDAVIT

I, David P. Patterson, do hereby state:

I am the Vice President of Engineering, Calling Communications Corporation ("Calling"). I have read and am familiar with the statements made in Calling's Reply Comments. Those statements are true and correct to the best of my knowledge, information and belief.

Dated: November 30, 1992



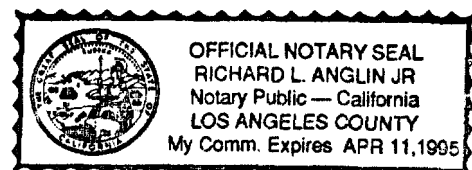
David P. Patterson

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELS)

On November 30, 1992 before me, the undersigned, a Notary Public in and for said County and State, personally appeared David P. Patterson, known to me to be the person who executed the within instrument, and acknowledged to me that he executed the same.

Signature: 

Richard L. Anglin, Jr.



CERTIFICATE OF SERVICE

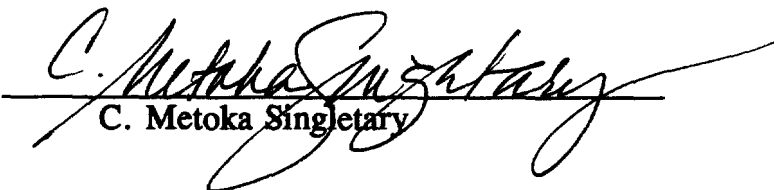
I, C. Metoka Singletary, do hereby certify that a true and correct copy of the foregoing "Reply Comments of Calling Communications Corporation" was sent, via first class mail, postage paid, on December 1, 1992, to the following:

Mr. Norman P. Leventhal, Esq.
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Counsel for Norris Satellite Communications, Inc.


C. Metoka Singletary